

Exhibit A-1

From: [Bryan Skoric](#)
To: [Paula Kuck](#)
Cc: [Dustin Slade](#)
Subject: FW: Equality State Policy Center v. Gray (Time Sensitive)
Date: Wednesday, July 9, 2025 11:09:35 AM
Attachments: [2025.06.06 WY DPOC Nominal Parties Agreement Single Clerks.docx](#)
[Waiver of Service - Clerks - Complnt and Motion for PI.doc](#)
[2 - Mtn for PI.pdf](#)
[1 - COMPLAINT.pdf](#)
[19 - Scheduling Order.pdf](#)

From: Katie Chamblee-Ryan <kchambleeryan@elias.law>
Sent: Friday, June 6, 2025 10:04 AM
To: Bryan Skoric <Bryan.Skoric@parkcounty-wy.gov>
Subject: Equality State Policy Center v. Gray (Time Sensitive)

Counsel,

I am counsel for the plaintiff in Equality State v. Gray, in which the Park County Clerk is named as a defendant. I previously reached out through a list-serv that I was told included all of the county attorneys, but I am sending this to you separately in case that message did not reach you.

We want to find out if your client is willing to execute a waiver of service form (attached). The benefits of waiving service under the Federal Rules of Civil Procedure are that the County Clerk will not have to pay the expenses associated with service and will have additional time to respond to the Complaint. **If your client is willing to waive service, please return the signed waiver to us as soon as possible.** We will likely have to pursue in person service next week for any clerks who do not waive, so please also tell us if you need time to discuss this with the clerk and when you anticipate a decision.

We also want to discuss the extent of the County Clerks' involvement in the active defense of this litigation. The County Clerks were named as defendants to ensure that the Plaintiff can obtain the relief it seeks in this case—namely, declaratory and injunctive relief regarding HB 156, which will now require voters to provide documentary proof of citizenship to register to vote. That said, we recognize that the County Clerks may have no interest in mounting their own legal defense of HB 156 separate from the defense by the Defendant Secretary of State and may reasonably take the position that they will comply with the law, including any orders or judgments by the Court in this case.

If that is the case for your client, we are willing to enter into a nominal defendants agreement, under which participating County Clerks would agree to respond to any discovery directed to them, participate in trial as a witness as called, and be bound by the judgment of the Court, but would otherwise not affirmatively participate in the defense of HB 156—relying on the Secretary of State to defend the law. In exchange, the Plaintiff will agree not to seek any attorneys' fees or costs against those County

Clerks who have entered into the agreement. This will protect those Counties against possible significant financial exposure that they otherwise might be vulnerable to under to 42 U.S.C. § 1988, which provides for fee shifting in civil rights cases when the plaintiffs prevail, as well as allow them to avoid the costs and expenses that come along with being an active Defendant in a lawsuit. I have attached a draft nominal defendants agreement to this email, as well as a draft of the proposed order that we would ask the Court to enter to memorialize the agreement.

Finally, in case you have not yet received them, I am including a copy of the Complaint, Plaintiff's Motion for a Preliminary Injunction, the supporting brief and evidence, and the Court's recent scheduling order (attached here).

Sincerely,

Katie Chamblee-Ryan

Attorney for Equality State Policy Center

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